

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE GENWORTH FINANCIAL, INC.,
SECURITIES LITIGATION,

Civ. A. No. 3:14-cv-00682-JAG

Hon. John A. Gibney, Jr.

CLASS ACTION

**LEAD PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Her Majesty The Queen In Right Of Alberta (“Alberta”) and the Fresno County Employees’ Retirement Association (“Fresno,” and together with Alberta, “Lead Plaintiffs”), by and through their undersigned counsel of record, respectfully move this Court for entry of an Order preliminarily approving the proposed class action Settlement of this Action.

This Motion is made pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, the Court’s March 15, 2016 Order (ECF No. 192), and the Court’s March 22, 2016 Order (ECF No. 193). The Court scheduled a hearing on this Motion for April 13, 2016, at 9:00 a.m.

Lead Plaintiffs seek an order:

- (1) Granting preliminary approval of the proposed class action settlement for \$219 million which, if granted final approval, would resolve this Action in its entirety;
- (2) Granting approval of the form, content and manner of the class notices to Settlement Class Members;
- (3) Certifying the Settlement Class for purposes of the Settlement; and
- (4) Scheduling a hearing, and certain deadlines related thereto, on final approval of the Settlement, proposed Plan of Allocation, and Lead Counsel’s motion for an award of attorneys’ fees and Litigation Expenses.

The specific terms of the proposed Settlement are set forth in the Stipulation and Agreement of Settlement (the “Stipulation”), attached as Exhibit 1 to the accompanying Memorandum of Law.

This Motion is supported by the accompanying Memorandum of Law; and the declaration of the mediator, the Hon. Layn R. Phillips (Fmr.), attached as Exhibit 2 to the accompanying Memorandum of Law.

Lead Plaintiffs believe this Motion is unopposed. For the Court's convenience, the Parties' agreed-upon form of proposed Preliminary Approval Order (and accompanying exhibits) is submitted herewith.

Dated: April 1, 2016

Respectfully submitted,

/s/ Susan R. Podolsky

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CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

DATED: April 1, 2016

/s/ Susan R. Podolsky

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